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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KAMRAN AZIZI & HEDYEH SHOAR a/k/a
HEDYEH AZIZI,

Defendants.

Case No. 3:14-cr-00510-VC

~~PROPOSED~~ ORDER

Upon motion of the government and for good cause shown, IT IS HEREBY ORDERED THAT the government, pursuant to Title 26, United States Code, Section 6103(h)(4)(D), may disclose to Defendant Kamran Azizi and Defendant Hedyeh Shoar, and their attorneys, the “returns” and “return information” gathered during the course of the investigation of Defendants in order to satisfy its obligations pursuant to Rule 16 of the Federal Rules of Criminal Procedure, 18 U.S.C. § 3500, and *Brady v. Maryland* and its progeny. For purposes of this Order, “return” and “return information” shall be defined as set forth in Section 6103.

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1 IT IS FURTHER ORDERED that:

2 1. Defendants, their attorneys, and all other individuals or entities assisting Defendants who
3 receive materials in connection with this case are prohibited from directly or indirectly providing access
4 to, or otherwise disclosing the contents of, these materials to anyone not working on the defense of this
5 criminal case, or otherwise making use of the materials in a manner unrelated to the defense of this
6 criminal case. Authorized use of materials related to the defense of this criminal case shall include
7 showing and discussing such materials with government and defense witnesses.

8 2. Defendants, their attorneys, and all other individuals or entities who receive materials in
9 connection with this case, shall maintain all materials in a manner consistent with the terms of this
10 Order. Materials produced to the defense after entry of this Order shall be stored in a secure manner in
11 boxes, files, or folders marked "UNDER PROTECTIVE ORDER - DO NOT DISCLOSE." Electronic
12 materials produced to the defense and printouts obtained from electronic materials shall be handled in
13 the same manner.

14 3. Defendants and their attorneys are required to give a copy of this Order to all individuals
15 or entities engaged or consulted by the defense in preparation for trial in this case. A violation of this
16 Order by Defendants, their attorneys, or others may result in contempt of court proceedings or other civil
17 or criminal sanctions.

18 4. Within 90 days of the conclusion of this case, including all related appeals, all documents
19 produced pursuant to this Order, and all copies thereof (other than exhibits of the Court), shall be
20 returned to the United States Attorney's Office. Alternatively, Defendants or their attorneys may inform
21 the United States Attorney's Office in writing that all such copies have been destroyed.

22 5. The provisions of this Order shall not terminate at the conclusion of this criminal
23 prosecution.

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25 IT IS SO ORDERED.

26 Date: September 8, 2015

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28 THE HONORABLE VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE